

Chapter 5

Other Required CEQA Analyses

This chapter addresses other required analyses of the proposed ROD/RAP as required by CEQA, including cumulative impacts, growth inducement, and significant irreversible environmental changes.

Cumulative Impacts

Requirements for Analysis

Section 15130 of the State CEQA Guidelines requires a reasonable analysis of the significant cumulative impacts of a proposed project. *Cumulative impact* refers to “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The cumulative impact that results from several closely related projects is:

the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines, Section 15355[b]). The cumulative impact analysis may be less detailed than the analysis of the project’s individual effects (State CEQA Guidelines Section 15130[b]).

Approach to Cumulative Impact Analysis

The methodology used to develop the cumulative impact analysis included reviewing the current general plans for the City of Novato and Marin County, the *Bel Marin Keys Unit V Expansion of the Hamilton Wetland Restoration Project SEIR/S* (Jones & Stokes 2003), the *Hamilton Army Wetland Restoration Plan Final EIR/EIS* (Conservancy 1998), the *Oakland Harbor Navigation Improvement (50-Foot) Project Final EIR/EIS* (U.S. Army Corps of Engineers and Port of Oakland 1998), and the *Long-Term Management Strategy Draft EIS/EIR* (U.S. Army Corps of Engineers et al. 1996). These projects and plans are described in publicly available documents.

Approval and implementation of the ROD/RAP is intended to facilitate implementation of the HWRP. The HWRP as described in the 1998 EIR/EIS, would be cumulatively beneficial to the environment in terms of many resource areas and would preclude development of the site for other more intensive and environmentally impacting land uses. Conceptually, the impacts associated with cleanup activities are captured in the cumulative scenario evaluated in the 1998 HWRP EIR/EIS. Nevertheless, details of the cleanup activities contained in the ROD/RAP, such as site locations, timing of clean up, and extent of cleanup activities, may result in different or new cumulative impact considerations. Because the clean up is a component of the HWRP implementation, cumulative impacts of the ROD/RAP are evaluated in the context of the overall HWRP cumulative analysis.

Geology, Soils, and Seismicity

The implementation of the proposed ROD/RAP is not expected to exacerbate or contribute to seismic hazards and would not result in a cumulative impact. Activities related to the ROD/RAP, as discussed in Section 3.1, are not expected to result in an increase in erosive conditions on the site that would contribute to a cumulative erosion impact. The ROD/RAP does not include the placement of any permanent structures on the site, and thus a significant geological impact is not expected.

Water Resources

Completion of cleanup activities proposed in the ROD/RAP would result in a long-term improvement in water quality by reducing potential for introduction of contaminants into area waters. Implementation of the ROD/RAP, in combination with other remediation and restoration activities at HAAF, the SLC parcel, BMKV, and other sites, would be expected to cumulatively result in reduced levels of contaminants that could degrade water quality, as well as improved functioning of wetlands to filter contaminants from runoff and enhance water quality.

Ground-disturbing activities under the ROD/RAP along with other projects envisioned in the area would result in potential short-term water quality impacts to San Pablo Bay and other water courses in the area as a result of increased sedimentation. The contribution from ROD/RAP cleanup activities is expected to be minor since most actions would occur within the airfield parcel, which is largely bounded by levees that limit runoff into San Pablo Bay or outfalls that lead to San Pablo Bay. Cleanup activities would also be subject to best management practices (BMPs) to further reduce potential sedimentation. Cleanup activities are therefore not expected to contribute to cumulative water quality impacts.

ROD/RAP activities are not expected to result in a physical adverse effect on flooding, and thus would not contribute to a cumulative significant physical effect on flooding.

Public Health

Implementation of the proposed ROD/RAP would result in a minor and temporary increase in the potential for mosquito production and would not contribute to a significant cumulative impact. Mosquito abatement practices would be implemented as deemed necessary as part of the larger HWRP.

Biological Resources

Cleanup activities in the coastal salt marsh area would result in the temporary and permanent loss of coastal salt marsh (approximately 5.5 and 0.4 acres, respectively) that provides habitat for a number of sensitive species. This project and others, including the HWRP, BMKV restoration, and other remedial actions and restoration projects in the area, would cumulatively contribute to a short-term loss in coastal salt marsh. Nevertheless, these projects would substantially increase the acreage of tidal marsh habitat available for sensitive wildlife species in the long term and would result in a net increase in habitat value, particularly for tidal-marsh-dependent species in this portion of San Pablo Bay. Therefore, the proposed ROD/RAP is expected to contribute considerably to a cumulative beneficial impact for biological resources.

Land Use and Public Utilities

Implementation of the ROD/RAP activities would have short-term effects on the surrounding area through effects on air, noise, and transportation. However, these activities would not result in permanent incompatibilities with surrounding land uses. Implementation of the HWRP, which would be facilitated by the ROD/RAP cleanup activities, would result in land use patterns that would be consistent with the current and planned land uses in the area and would not contribute to cumulative effects.

Hazardous Substances and Waste

In addition to the proposed remedial process proposed in the ROD/RAP, remedial issues have also been addressed on other parts of the former HAAF installation and are currently being addressed at the SLC parcel. The Navy ball fields are being addressed under the Navy BRAC process. The SLC parcel is being addressed under the FUDS process. Future cleanup activities may also

occur on the adjacent BMKV parcel as part of the HWRP. It is assumed that the remedial selection process for these sites will result in implementation of remedial approaches that will clean up any contamination at these adjacent areas to a condition suitable for the proposed wetlands reuse.

The proposed ROD/RAP, in combination with other remedial actions completed or underway in the project area, would have a less-than-significant cumulative impact related to hazardous materials conditions.

Transportation

Construction traffic would represent a short-term, minor increase in traffic that could contribute to congestion on roadways in the City of Novato and adjacent areas and on state roads. A construction traffic plan would be implemented as part of the final design for site remediation. The construction plan would ensure that construction traffic is routed through appropriate non-congested intersections and is concentrated during off-peak hours.

Air Quality

Activity associated with implementation of the ROD/RAP is expected to result in annual emissions that are below BAAQMD *de minimis* threshold levels for ozone precursors and, with implementation of mitigation measures, for PM10. The BAAQMD thresholds are designed to evaluate individual projects in light of the cumulative environment of Bay Area air quality, and thus a project that does not result in emissions above the thresholds does not result in a considerable contribution to a cumulative impact on air quality.

Construction activity therefore would not cause or contribute to any new violation of ambient air quality standards, increase the severity or frequency of any existing standard violation, or delay timely attainment of any standard. Wetland restoration projects proposed on HAAF, BMKV, and the SLC parcel, are unlikely to occur simultaneously. Nevertheless, based on air emissions estimates prepared for other wetland restoration projects, concurrent performance of these projects would not be expected to exceed BAAQMD *de minimis* levels.

Noise

Implementation of actions in the proposed ROD/RAP is not expected to contribute to significant long-term cumulative noise impacts. Remedial activities under the ROD/RAP, in combination with other noise-generating sources, would exacerbate noise conditions at sensitive receptor locations. However, these noise levels could be reduced through appropriate construction practices to a less-than-significant level. Most noise-generating activities in the area would be related to

traffic, although some noise may be generated by continuing construction on the New Hamilton Partnership properties. Other large-scale construction activities proposed in the area that could contribute to cumulative noise conditions, such as wetland restoration on the BMKV and SLC parcels, are unlikely to occur concurrent with implementation of the ROD/RAP. With mitigation, the activities proposed in the ROD/RAP would not be expected to contribute considerably to a cumulative noise impact.

Cultural Resources

Implementation of the ROD/RAP is not expected to contribute to a cumulative loss of cultural resources in the region. The HAAF main airfield parcel and adjacent coastal salt marsh are not known or likely to contain cultural resources that would be lost or contribute to a cumulative loss. Remedial measures would not have an impact on the character of the adjacent HAAF historic district.

Growth Inducement

A project is considered growth inducing if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, or encourages other activities that cause significant environmental effects (State CEQA Guidelines Sec. 151262[d]).

Approval and implementation of the proposed ROD/RAP would have no direct effect on growth inducement. Implementation of the ROD/RAP would enable the ultimate use of the site for wetland restoration, which would indirectly limit growth by precluding development of the site for developed uses that could be growth inducing.

Significant Irreversible Changes in the Environment

Section 15126[f] of the State CEQA guidelines requires EIRs to include a discussion of significant, irreversible environmental changes that would result from project implementation.

Approval of the ROD/RAP and implementation of the remedial measures proposed therein would result in the irretrievable commitment of petroleum products to fuel vehicles and equipment. Although implementation of the ROD/RAP would condition future use of the site through institutional controls, these restrictions would not represent an irreversible change to the environment.